QUALITATIVE $PM_{2.5}$ HOT SPOT CONFORMITY DEMONSTRATION SR-241, FOOTHILL TRANSPORTATION CORRIDOR SOUTH JULY 12, 2006

Foothill Transportation Corridor South (FTC-S) (also known as the South Orange County Transportation Infrastructure Improvement Project [SOCTIIP]) is a nonexempt project, which is also not "a project of air quality concern (POAQC)" as specified in the conformity rule (*$PM_{2.5}$ and PM_{10} Hot-Spot Analyses in Project-Level Transportation Conformity Determinations for the New $PM_{2.5}$ and Existing PM_{10} National Ambient Air Quality Standards,* 40 CFR Part 93). However, in the interest of public information, a qualitative $PM_{2.5}$ hot spot assessment is included in the proposed Final EIS that will be circulated for public review.

The following qualitative assessment of the $PM_{2.5}$ hot spot potential of the proposed Foothill Transportation Corridor South toll road addresses the recommended topics specified in the United States Environmental Protection Agency's (EPA) *Transportation Conformity Guidance for Qualitative Hot Spot Analyses in $PM_{2.5}$ and PM_{10} Nonattainment and Maintenance Areas* (EPA420-B-06-902, March 2006).

PROJECT HISTORY

Planning for a transportation corridor in South Orange County that would connect to I-5 began 25 years ago. In 1981, The County Master Plan of Arterial Highways (MPAH) was amended to include several transportation corridors to meet the long-term needs of fast-growing Orange County. While these corridors were initially contemplated to be public parkways, the shortage of federal and State funding for new highway projects led the County to pursue implementation through a toll road funding mechanism. The FTC-S Preferred Alternative represents the last segment of the Orange County toll road system to be implemented.

The most recent environmental documentation for the SOCTIIP was initiated six years ago. The California Environmental Quality Act (CEQA) portion of the process was completed when the Transportation Corridor Agencies (TCA) Board of Directors acted in February 2006 to approve the FTC-S Preferred Alternative and certify the Final Subsequent Environmental Impact Report (SEIR).

The Federal Highway Administration (FHWA) is the federal lead agency for the SOCTIIP Environmental Impact Statement (EIS), pursuant to the National Environmental Policy Act (NEPA). The United States Department of the Navy (DON), Marine Corps Base (MCB) Camp Pendleton is a Cooperating Agency for the EIS under NEPA because the southern segment of the Preferred Alternative transects the western portion of MCB Camp Pendleton. The environmental review effort has included ongoing coordination with other federal agencies, including the United States Fish and Wildlife Service (USFWS), the U.S. Army Corps of Engineers (ACOE), and the U.S. Environmental Protection Agency (EPA).

The SOCTIIP environmental document was prepared in compliance with the requirements of CEQA and NEPA and in a manner consistent with the NEPA/Section 404 Memorandum of Understanding (MOU). The federal agencies participating in this integration process are FHWA, EPA, USFWS, and ACOE. The California Department of Transportation (Caltrans) is an active participant as the local liaison for FHWA. The NEPA/404 MOU agencies, MCB Camp Pendleton, Caltrans, and the TCA are collectively referred to as the "SOCTIIP Collaborative."

The EPA and ACOE have preliminarily determined that the FTC-S Preferred Alternative is the least environmentally damaging practicable alternative (LEDPA). The USFWS has preliminarily indicated that the FTC-S Preferred Alternative will comply with applicable requirements of the Endangered Species Act. These determinations reflect the evaluations by these agencies in the Collaborative process conducted over the last six years.

Transportation Conformity is a component of the proposed Final EIS, which is currently being prepared under the direction of FHWA and Caltrans. Federal conformity requirements for addressing ROG, CO, NO_X and PM_{10} emissions associated with the project were met during interagency consultation with SCAG's Transportation Conformity Working Group on the Draft EIS/SEIR. Most recently, additional interagency consultation occurred for the amendment to SCAG's 2004 Regional Transportation Plan to reflect the Preferred Project scope (October 2005 through January 2006). Following completion of interagency review in January 2006, EPA promulgated a final conformity rule addressing $PM_{2.5}$ emissions. Since the FTC-S project was not fully approved by FHWA prior to April 1, 2006, the project must comply with the new $PM_{2.5}$ conformity rule. This document and associated interagency and public consultation address the $PM_{2.5}$ conformity rule requirements.

A figure identifying the alignment of the SOCTIIP Preferred Alternative is provided at the end of this document.

COMPLIANCE WITH CFR 93.116 AND 93.123

Section 93.116 (a) of 40 CFR states that an FHWA/Federal Transit Authority (FTA) project must not cause or contribute to any new localized $PM_{2.5}$ violations or increase the frequency or severity of any existing PM_{10} or $PM_{2.5}$ violations in nonattainment or maintenance areas. The regulations further state that projects may satisfy this requirement without an analysis of their potential to create $PM_{2.5}$ hot spots, provided they do not meet the criteria set forth in Section 93.123 (b) for "projects of air quality concern."

A project may be considered to have one of three types of status:

1. Exempt
2. Not be exempt but not be a POAQC based on the specific parameters established in the regulations
3. It may be a POAQC, which requires that a qualitative hot-spot analysis be conducted

The FTC-S Preferred Alternative does not meet the definition of an exempt project under Section 93.123(b). The FTC-S Preferred Alternative also does not fall within the five types of projects considered to be POAQC that require a hot-spot analysis (see below). As a nonexempt project that is

not a POAQC, the Preferred Alternative thus does not require a $PM_{2.5}$ hot-spot analysis as part of its conformity determination.

The five types of projects considered to be POAQC are:

1. New or expanded highway projects that have a significant number of or significant increase in diesel vehicles
2. Projects affecting intersections that are at, or will change to, Level of Service (LOS) D, E, or F because of increased traffic volumes related to the project from a significant number of diesel vehicles
3. New bus and rail terminals, and transfer points, that have a significant number of diesel vehicles congregating at a single location
4. Expanded bus and rail terminals and expanded transfer points, which significantly increase the number of diesel vehicles congregating at a single location
5. Projects in or affecting locations, areas, or categories of sites which are identified in the PM_{10} or $PM_{2.5}$ applicable implementation plan or implementation plan submission, as appropriate, as sites of violation or possible violation

In particular, the FTC-S Preferred Alternative does not fall within the category of "new or expanded highway projects that have a significant number of or significant increase in diesel vehicles." The March 2006 conformity rule and EPA guidance indicate that a new transportation facility with 8 percent or more diesel truck traffic, or more than 10,000 average daily truck trips, would warrant a $PM_{2.5}$ hot-spot analysis. In contrast, the FTC-S Preferred Alternative's diesel truck traffic component is estimated to be less than 4 percent for all years through 2025. This estimate is based on actual data for the existing toll roads in Orange County, including State Route 73 (SR-73), which connects Interstate 5 (I-5), Interstate 405 (I-405), State Route 261 (SR-261), and the existing portion of State Route 241 (SR-241).

The highest projected traffic volume segment on the FTC-S is just south of Oso Parkway, with 58,000 average daily trips (ADT) in 2025. At 4 percent trucks, the highest level of trucks on any segment of the facility would be 2,320 ADT, not all of which are diesel-fueled. This level of truck traffic is more than 75 percent below the 10,000 ADT indicator discussed in the EPA conformity guidance. Further, the FTC-S Preferred Alternative does not impact any intersection with LOS D, E, or F, which is another indicator of the need for a qualitative $PM_{2.5}$ hot-spot analysis.

Also, the FTC-S Preferred Alternative is not a bus, rail, truck, or intermodal transfer station, nor has it been identified in an applicable implementation plan as a site of violation or possible violation. The Guidance provides examples or projects that are not of air quality concern, including new or expanded highway projects that primarily serve gasoline vehicle traffic, which is an appropriate description of the proposed project.

Although the project is not a POAQC pursuant to 40 CFR 93.116, the proposed Final EIS provides information that establishes qualitatively that no $PM_{2.5}$ hot spots are likely under the FTC-S Preferred Alternative.

> "Future new or worsened $PM_{2.5}$ violations of any standard are not anticipated as a result of the Preferred Alternative for several reasons. First, the proposed project has been on regional transportation plans for 25 years and is reflected in the AQMD air quality modeling efforts for the region. Therefore, emissions from the project are reflected in the air quality modeling for the SCAG RTP, which is a conforming plan. Second, the project does not qualify as a project of air quality concern as defined by the new $PM_{2.5}$ Hot Spot Rule because the percentage of the total truck traffic that is anticipated to be diesel trucks is less than 4 percent compared with the 8 percent diesel truck traffic component indicated in the Final Rule. Third, the existing ambient concentrations of $PM_{2.5}$ are well below the established thresholds. Therefore, it is very unlikely that the project's contributions would create a new, or worsen an existing, $PM_{2.5}$ violation."[1]

While the FTC-S Preferred Alternative will result in a very small increase in regional VMT (i.e., 14,981 vehicle miles per day in comparison to the 421,712,541 miles projected for the region), arterial road traffic will decrease substantially more (i.e., 386,398 miles per day). With implementation of the proposed project, traffic congestion will be reduced at arterial road intersections, where congestion could lead to $PM_{2.5}$ hot spots.

QUALITATIVE HOT-SPOT ANALYSES

The EPA's *Transportation Conformity Guidance for Qualitative Hot Spot Analyses in $PM_{2.5}$ and PM_{10} Nonattainment and Maintenance Areas* provides a list of what should be documented for a qualitative $PM_{2.5}$ or PM_{10} hot-spot analysis. Generally, the purpose of the hot-spot analysis is to document how the proposed project meets the requirements in 40 CFR 93.116 and 92.123. As described above, a qualitative analysis of the SOCTIIP Preferred Alternative is not required because the project is not a POAQC. However, a qualitative analysis was performed for information purposes and is summarized below in accordance with the EPA's Guidance.

1. Description of the Proposed Project

The Preferred Alternative is the portion of the toll road system that would extend south to connect with I-5 near the San Diego County border; it has been and is still known as the FTC-S project. It is the last segment of the toll road system to be completed and will extend the existing SR-241 (also known as FTC-N) in a southerly direction. The existing SR-241 was designed and constructed by TCA and is owned and maintained by Caltrans.

The FTC-S Preferred Alternative (A7C-FEC-M Alternative) consists of six mixed-flow toll lanes, three lanes in each direction, from Oso Parkway to the Cristianitos interchange, where the facility will be reduced to two lanes in each direction as it reaches its connection with I-5. This configuration provides one fewer lane in each direction than the original project design (CP Alignment). A total of 11 miles of the 15.9-mile project fall within the Southern California Association of Governments (SCAG) Metropolitan Planning Organization (MPO) boundaries, with the remaining 5-mile segment within the San Diego Association of Governments (SANDAG) MPO boundaries. (The portion of the

[1] Source: Proposed Final EIS, Section 4.7.1

project located within the SANDAG MPO is on federal land, specifically MCB Camp Pendleton.) The scope of the proposed project is listed and modeled in SCAG's 2004 Regional Transportation Plan (RTP) and 2004 Regional Transportation Improvement Program (RTIP).

2. Description of the Hot-Spot Analysis Methodology

Analysis Method. The qualitative hot-spot analysis was conducted using the existing $PM_{2.5}$ concentrations monitored at the nearby Mission Viejo Air Quality Monitoring Station.

Data Considered. EPA issued a final rule for $PM_{2.5}$ and PM_{10} hot-spot analyses in project-level transportation conformity determinations for the new $PM_{2.5}$ and existing PM_{10} national ambient air quality standards (NAAQS) on March 10, 2006 (71 Fed. Reg. 12468) ("Final Rule"). The Final Rule became effective on April 5, 2006, and requires a qualitative $PM_{2.5}$ hot-spot anlysis to be completed for project-level conformity determinations for projects of air quality concern completed in $PM_{2.5}$ nonattainment areas. EPA is not requiring quantitative analyses of these projects at this time since quantitative hot-spot modeling techniques and associated EPA modeling guidance still do not exist (71 Fed. Reg. 12471). Only projects that are PAOQC are required to complete qualitative $PM_{2.5}$ hot-spot analyses. As described above, the FTC-S Preferred Alternatve is not a POAQC; however, a qualitative anaysis was performed for information purposes.

An example of a project that would be considered to be of air quality concern is a highway that serves a significant volume of diesel truck traffic, such as facilities with greater than 125,000 annual average daily traffic (AADT), and 8 percent or more of such AADT being diesel truck traffic (71 Fed. Reg. 12491). FTC-S does not meet any of the definitions of projects that are considered to be of air quality concern. FTC-S is projected to serve approximately 54,000 ADT. Also, it is projected that truck traffic on the SR-241 extension will be less than 4 percent of the total vehicular traffic. (The existing fleet mix on the toll roads in Orange County ranges from less than 1 percent truck traffic to 3.6 percent trucks.) EPA specifically indicated that new highways that primarily service gasoline vehicle traffic, including such projects involving congested intersections operating at LOS D, E, or F, do not meet the criteria for a POAQC (71 Fed. Reg. 12491). FTC-S is expected to primarily serve gasoline vehicle traffic and not diesel truck traffic. Furthermore, FTC-S is not a designated truck route, and the project does not include intermodal or bus terminals. Therefore, the Proposed Project is not a POAQC.

Although the proposed project is not a POAQC, a qualitative analysis was conducted for the project. The qualitative analysis was prepared in accordance with EPA's *Transportation Conformity Guidance for Qualitative Hot-spot Analysis in $PM_{2.5}$ and PM_{10} Nonattainment and Maintenance Areas* that was issued on March 29, 2006. The qualitative analysis reflects the monitored concentrations of $PM_{2.5}$ in the vicinity of the FTC-S. The monitored $PM_{2.5}$ concentrations at the Mission Viejo Station (the nearest station to the proposed project) shown in Table A indicate that the federal 24-hour $PM_{2.5}$ standard ($65\mu g/m^3$) and the federal annual standard ($15\mu g/m^3$) were not exceeded within the past three years. The average of the 98th percentile 24-hour concentrations is $36\ \mu g/m^3$ well below the federal threshold of $65\mu g/m^3$. In addition, the average of the past three years' annual average concentrations is $11.9\ \mu g/m^3$, also below the federal standard of $15\ \mu g/m^3$.

Table A: $PM_{2.5}$ Measurements ($\mu g/m^3$) at the Mission Viejo AQ Station

Year	24-Hour Measurements					Annual Average
	1st High	2nd High	3rd High	4th High	98th Percentile	
2003	50.6	43.5	37.6	31.5	38	13.1
2004	49.4	45.8	38.5	32.3	39	12.0
2005	35.3	34.5	31.4	21.6	31	10.6
Average					36	11.9
Threshold ($\mu g/m^3$)					65	15
Percentage of Threshold					55%	79%
No. Days Above National 24-Hour Standard	0	0	0	0		
Federal Annual Average Exceeded?						No

Source: ARB Web: http://www.arb.ca.gov/adam/welcome.html, April 2006.

An alignment similar to the alignment of the A7C-FEC-M Alternative is included in the modeling for the Air Quality Management Plan (AQMP). As defined in the AQMP modeling, FTC-S is described as an extension of SR-241 from Oso Parkway to I-5. Therefore, the SOCTIIP Alternative, A7C-FEC-M, which proposes an extension for SR-241 from Oso Parkway to I-5 in San Diego County, is consistent with the RTP and the AQMP modeling.

Future new or worsened $PM_{2.5}$ violations of any standard are not anticipated for several reasons. First, the proposed project has been on regional transportation plans for 25 years and is reflected in the Air Quality Management District (AQMD) air quality modeling efforts for the region. Second, the project does not qualify as a project of air quality concern as defined by the new $PM_{2.5}$ hot spot rule. Third, the existing ambient concentrations of $PM_{2.5}$ are very low and well below the established thresholds. Therefore, it is very unlikely that the project's contributions would create a new or worsen an existing $PM_{2.5}$ violation.

Conclusion. For the reasons described above, and given the very low existing average concentrations of $PM_{2.5}$ near the proposed project, future new or worsened $PM_{2.5}$ violations of any standard are not anticipated, and, therefore, the project meets the conformity hot-spot requirements in 40 CFR §§ 93.166 and 93.123 for $PM_{2.5}$.

3. Description of the Type of $PM_{2.5}$ Emissions Considered in the Qualitative Analysis

The hot-spot analysis is based on directly emitted $PM_{2.5}$ attributable to an individual transportation project, since secondary particles formed through $PM_{2.5}$ precursors take several hours to form in the atmosphere, giving emissions time to disperse beyond the immediate area of concern for localized analysis.

4. Description of Existing Conditions

The study area for the FTC-S Preferred Alternative encompasses the southeast part of Orange County and the northernmost part of San Diego County, and 10 cities bordering or in the vicinity of I-5 between its confluence with I-405 in central Orange County and its intersection with Basilone Road in San Diego County. The total number of residents in south Orange County in 2000 was 481,900; this is forecast to increase to 627,568 residents in 2025. The total number of employees in south Orange County is forecast to increase from 207,193 employees in 2000 to 304,938 employees in 2025. There are numerous existing deficiencies at freeway segments, freeway ramps, and arterial intersections as listed in Section 1.4.1 of the Final SEIR/Proposed Final EIS.

The background levels of $PM_{2.5}$ in the study area do not exceed the federal AAQS. Specifically, $PM_{2.5}$ concentrations at the Mission Viejo Station have not exceeded the federal 24-hour standard within the past five years. The annual average concentrations exceeded the State standard in three of the past five years and exceeded the federal standard in 2001 and 2002, but not since then.

The EPA has designated the South Coast Air Basin (SCAB) as nonattainment for $PM_{2.5}$ and San Diego as attainment for $PM_{2.5}$.

5. Description of the Changes that will Result in the Future from the Project

As stated in the adopted purpose and need statement, transportation infrastructure improvements are necessary to address needs for mobility, access, goods movement, and projected freeway capacity deficiencies and arterial congestion in south Orange County. Freeway capacity deficiencies and arterial congestion are anticipated as a result of projected traffic demand, which would be generated by projected increases in population, employment, housing, and intra- and inter-regional travel estimated by SCAG and SANDAG. The purpose of the FTC-S Preferred Alternative is to provide improvements that would help alleviate future traffic congestion and accommodate the need for mobility, access, goods movement, and future traffic demands on I-5 and the arterial network in the study area. The project would improve the projected future LOS and reduce the amount of congestion and delay on the freeway system and, as a secondary objective, the arterial network, in southern Orange County.

Traffic and emissions modeling for the FTC-S Preferred Alternative demonstrates congestion relief and associated emission reductions within the region and the South Orange County study area. While the FTC-S Preferred Alternative will result in a very small increase in regional VMT (i.e., 14,981 vehicle miles per day in comparison to the 421,712,541 miles projected for the region), arterial road traffic will decrease substantially more (i.e., 386,398 miles per day). Traffic will be removed from arterial road intersections where congestion could otherwise contribute to $PM_{2.5}$ hot spots.

6. Description of the Analysis Years Examined

The emissions for the proposed project were examined for opening day (2008), 2018, and 2025. The project would result in less than 4 percent truck traffic, which means that there would be 2,320 trucks/day on the heaviest segment in 2025.

7. Description of Mitigation Measures and Their Expected Effects

The conformity regulation requires written commitment from the project sponsor for the final plans, specifications, and estimates to include control measures to limit $PM_{2.5}$ emissions from the construction activities and/or normal use and operation associated with the project identified in the applicable State Implementation Plan (SIP). Although the air quality study does not identify a potential $PM_{2.5}$ violation or increase in severity from the project at completion, the mitigation measures below have been identified as an extra margin of insurance that no exceedances will occur.

The SOCTIIP certified Final SEIR and proposed Final EIS spells out the Foothill/Eastern Transportation Corridor Agency's commitment to providing mitigation measures to control $PM_{2.5}$ emissions (Proposed Final EIS, Section 4.7.4). These include two measures from Appendix IV-C of the South Coast Air Quality Management District (SCAQMD) that are applicable to the FTC-S Preferred Alternative.

The AQMP includes two measures that are applicable to the SOCTIIP build Alternatives. Measures AQ-6 and AQ-7 below are included to insure consistency with the measures contained in the AQMP. These measures are directly from Appendix IV of the AQMP.[1]

> "The following PM_{10} and $PM_{2.5}$ mitigation measures apply to the Preferred Alternative:
>
> Particulate Emission (PM_{10}) Control
>
> Measure AQ-1. During construction, contractor specifications shall incorporate directions to contractors to control fugitive dust. Fugitive dust shall be controlled by regular watering, paving construction roads, or other dust preventive measures, as defined in SCQAMD Rule 403.
>
> After clearing, grading, earth moving or excavation the following activities will be performed by the construction contractor:
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> a. Seeding and watering will be performed until viable vegetation cover is in place in inactive areas.
>
> b. Soil binders will be spread.
>
> c. Areas will be wet down sufficiently to form a crust on the surface. Repeated soakings will be performed as necessary to maintain this crust.
>
> d. Reduce speeds to 10 to 15 mph in construction zones on unpaved areas.
>
> Measure AQ-2. During construction, measures contained in Tables 1 and 2 of SCAQMD Rule 403 will be implemented by the construction contractor. Control of particulate emissions from construction activities is best controlled through the requirements contained in SCAQMD's Rule 403, Tables 1 and 2. Tables 1 and 2 are reproduced here as Tables 4.7-60 and 4.7-61. The measures

[1] Source: Proposed Final EIS, Sections 4.7.4.2 through 4.7.4.3

contained in these tables are presented as an option to air quality monitoring in Rule 403. Table 4.7-60 contains measures such as maintaining an adequate moisture content in the soil, watering grading areas, establishing ground cover in inactive areas and watering unpaved roads. Table 4.7-61 identifies additional measures that are applied during high wind conditions. The mitigation measure, therefore, is to require that the measures contained in Tables 1 and 2 of Rule 403 be utilized. This potentially results in a much higher reduction of particulate emissions than if the air monitoring option contained in Rule 403 was employed. The air monitoring option requires monitoring around the project site, and as long as pollutant levels do not exceed threshold limits, no pollutant emission reduction measures are employed. The measure would be triggered prior to the initiation of grading.

Measure AQ-3. During construction, the contractor shall be responsible for sweeping all public streets adjacent to the project site once a day if visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water). This condition would apply to those areas where construction traffic leaves the project site and travels onto public roadways.

Measure AQ-4. During construction, the contractor shall be responsible for installing wheel washers where vehicles enter and exit unpaved roads onto paved roads, or wash trucks and any equipment leaving the site each trip.

Construction Equipment Emission Control

Emissions generated by construction equipment will exceed SCAQMD thresholds. The generation of these emissions is almost entirely due to engine combustion in construction equipment and employee commuting. The measures below address these emissions.

Measure AQ-5. During final design, contractor specifications shall require that contractors implement the following measures:

- Use low emission mobile construction equipment.
- Maintain construction equipment engines by keeping them tuned.
- Use low sulfur fuel for stationary construction equipment. This is required by SCAQMD Rules 431.1 and 431.2.
- Utilize existing power sources (i.e., power poles) when feasible. This measure would minimize the use of higher polluting gas or diesel generators.
- Configure construction parking to minimize traffic interference.
- Minimize obstruction of through-traffic lanes. When feasible, construction should be planned so that lane closures on existing streets are kept to a minimum.

- Schedule construction operations affecting traffic for off-peak hours.
- Develop a traffic plan to minimize traffic flow interference from construction activities (the plan may include advance public notice of routing, use of public transportation and satellite parking areas with a shuttle service).
- Include in construction grading plans a statement that work crews shut off equipment when not in use.
- Support and encourage ridesharing and transit incentives for the construction crew.

Measure AQ-6. During construction, any material deposited onto paved roads due to a major storm event must be removed within 72 hours of the event by the contractor. Additional time is allowed for mudslides or similar events that block traffic over the material. In the event of road closures due to mudslides or other overwhelming accumulations of material, public access should be restricted until all the material is removed.

Measure AQ-7. During construction, the contractor shall be responsible for implementing a control measure which specifies three "preventive" and one "mitigative" control option(s) that would be mandatory of all unpaved road connections with paved public roads. The four mandatory control options include:

- Paving the last 100 feet from an unpaved roadway connection with a paved road;
- Chemical stabilization of the last 100 feet from an unpaved roadway connection with a paved road at sufficient frequency and concentration to maintain a stabilized surface at all times.
- Installation of dirt removal devices (e.g., tire cleaning device, grizzlies, etc.);
- Cleaning of public paved road surface at any time visible track-out occurs."

8. Conclusion

Future new or worsened $PM_{2.5}$ violations of any standard are not anticipated as a result of the Preferred Alternative for several reasons. First, the proposed project has been on regional transportation plans for 25 years and is reflected in the AQMD air quality modeling efforts for the region. Therefore, emissions from the project are reflected in the air quality modeling for the SCAG RTP, which is a conforming plan. Second, the project does not qualify as a project of air quality concern as defined by the new $PM_{2.5}$ Hot Spot Rule because the percentage of the total truck traffic that is anticipated to be diesel trucks is less than 4 percent compared with the 8 percent diesel truck traffic component indicated in the Final Rule. Third, the existing ambient concentrations of $PM_{2.5}$ are well below the established thresholds. Therefore, it is very unlikely that the project's contributions would create a new, or worsen an existing, $PM_{2.5}$ violation.